

ORIGINAL

Legal Department

JAMES MEZA III
Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
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(404) 335-0769

July 6, 2004

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
04 JUL -6 PM 4:32
COMMISSION
CLERK

Re: Docket No.: 040353-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for BellSouth's Responses to Staff's First Set of Interrogatories (Nos. 3 and 4) and Staff's First Request for Production of Documents (No. 1), which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

James Meza III / R &
James Meza III

CMP _____
COM _____
CTR _____ Enclosures
ECR _____
GCL 1 cc: All Parties of Record
OPC _____ Marshall M. Criser III
MMS _____ R. Douglas Lackey
RCA _____ Nancy B. White
SCR _____
SEC 1
OTH 1 conf
records

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN 073551-04. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.
(x-ref. 06591-04 + 06592-04)

DOCUMENT NUMBER-DATE
07355 JUL -6 3
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 040353-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail and Electronic Mail this 6th day of July, 2004 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal **Services**
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Telephone: (850) 413-6199
ateitzma@psc.state.fl.us

Ann Shelfer, Esq.
Supra Telecommunications and
Information Systems, Inc.
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Telephone: **(850) 402-0510**
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ashelfer@stis.com

Brian Chaiken, Esq.
Supra Telecommunications & Info Sys
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2620 S.W. 27th Avenue
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James Meza III

Jorge Cruz-Bustillo
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Fax: (305) 443-1078
Jorge.cruz-bustillo@stis.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	
)	
Petition of Supra Telecommunications)	Docket No. 040353-TP
And Information Systems, Inc. to Review)	
And Cancel BellSouth's Promotional Offering)	Filed: July 6, 2004
Tarriffs Offered in Conjunction With its New)	
Flat Rate Service Known as PreferredPack)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, **and** Section 364.183, Florida Statutes, and files this Request for Specified Confidential Classification.

1. On June 14, 2004, BellSouth filed its Response to the Florida Public Service Commission Staff, hereinafter ("Staff")'s First Set of Interrogatories (*Nos.* 1-14) **and** First Request for Production of Documents (Nos. 1-4), portions of which contain confidential business information.

2. Because BellSouth's Response to the Staff's First Set of Interrogatories, Nos. 3, 4 **and** 11 and BellSouth's Response to Staff's First Request for Production of Documents No. 1 contain confidential business, proprietary information, BellSouth also filed a Notice of Intent. A more specific description of this information **is** provided in Attachment A. These documents should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open **Records** Act.

3. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.

4. Attachment C to BellSouth's Request for Confidential Classification is a highlighted **copy** of the document containing the confidential information.

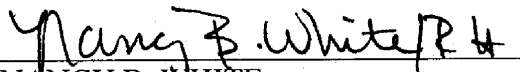
5. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this private financial information as confidential in all requests, and this information has not been generally disclosed.


6. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a **copy** was served on the Parties.

WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information **described** above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 6th day of July, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.


NANCY B. WHITE
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(305) 347-5558


R. DOUGLAS LACKEY
JAMES MEZA III
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BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
Page 1 of 2
7/6/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S FIRST SET OF INTERROGATORIES, NOS. 3, 4 AND 11, AND FIRST
REQUEST FOR PRODUCTION, NO. 1, FILED JUNE 14, 2004, IN FLORIDA DOCKET
NO. 040353-TP**

Explanation of Proprietary Information

1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with **an** advantage in that they would know **the** price or rate **below** which BellSouth **could not provide** the service. The data is valuable to competitors and potential competitors in formulating strategic plans **for** entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors **is** not available to BellSouth. Disclosure of this data would impair the competitive business **and** cause harm to BellSouth. Consequently, this information should be classified **as** proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act,

Location

Reason

Interrogatory No. 3

Response:

Page 2 of 3-

Subpart a), First and Second Line

Subpart c), First Line

Subpart d) and e), First Line

Page 3 of 3-

Subpart g), First Line

Subpart i), First Line

1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S FIRST SET OF INTERROGATORIES, NOS. 3, 4 AND 11, AND FIRST
REQUEST FOR PRODUCTION, NO. 1, FILED JUNE 14, 2004, IN FLORIDA DOCKET
NO. 040353-TP

<u>Location</u>	<u>Reason</u>
<u>Interrogatory No. 4</u> Response: Page 2 of 3- Subpart a), First and Second Line Subpart c), Third Line Subpart f), Fifth Line Page 3 of 3- Subpart g), Eighth Line Subpart h), Second Line Subpart i), Third, Fourth, Fifth, Sixth , Eighth, Tenth, Eleventh and Twelfth Lines	1
<u>Interrogatory No. 11</u> Response: Page 1 of 1- Subpart a), Second Line Subpart b), Second Line	1

<u>Location</u>	<u>Reason</u>
<u>POD No. 1</u> Entire Document	1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
Page 1 of 1
7/6/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S FIRST SET OF INTERROGATORIES, NOS. 3, 4 AND 11, AND FIRST
REQUEST FOR PRODUCTION, NO. 1, FILED JUNE 14, 2004, IN FLORIDA DOCKET
NO. 040353-TP**

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

ATTACHMENT C

**BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
Page 1 of 1
7/6/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S FIRST SET OF INTERROGATORIES, NOS. 3, 4 AND 11, AND FIRST
REQUEST FOR PRODUCTION, NO. 1, FILED JUNE 14, 2004, IN FLORIDA DOCKET
NO. 040353-TP**

PROPRIETARY COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition *for* Expedited Review of Growth) Docket No. 040574-TL
Code Denials by the **Number** Pooling Administrator)
for the Winter Park exchange) Filed: July **8**, 2004
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Specified Confidential Classification and states the following:

1. **On** June 17, 2004, BellSouth Telecommunications, Inc. filed a Petition for Expedited Review of NXX Code Denial for the Winter Park exchange, along with Attachments **1** and 2. Attachments **1** and 2 contain information that **is** considered confidential and proprietary to BellSouth. A Notice of Intent to Request Specified Confidential Classification for those attachments **was also** filed on the same day.
2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing **a** Request for Confidential Classification for Attachments **1** and 2 because said attachments contain switch utilization information that is considered confidential and **proprietary** to BellSouth. A more specific description of this information **is** contained in Attachment A.
3. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought **as** private, and this information has not been generally disclosed.
4. Appended hereto **as** Attachment B are **two** copies of the requested documents with the confidential information deleted.

**CERTIFICATE OF SERVICE
Docket No. 040574-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

First Class U.S. Mail this 8th day of July, 2004 to the following:

~~Kira Scott~~
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

NANPA
Thomas Foley
NPA Relief Planner
820 Riverbend Blvd.
Longwood, Florida 32779-2327
Tel. No.: (407) 389-8929
Fax. No.: (407) 682-1108
thomas.foley@neustar.com

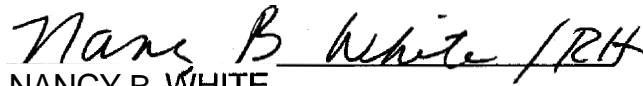

Nancy B. White

5. Appended hereto as Attachment C is a sealed envelope containing one **copy of** the documents including the material which **is** confidential and proprietary.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that **is** not subject to public disclosure.

Respectfully submitted this 8th day of July, 2004.

BELLSOUTH TELECOMMUNICATIONS, **INC.**



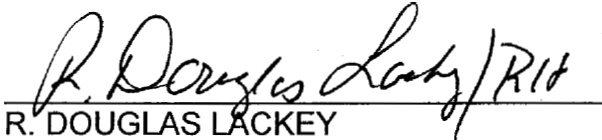
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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 040574-TL
Request for Specified Confidential Classification
Page 1 of 1
07/08/04

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION FOR
BELLSOUTH'S PETITION FOR EXPEDITED REVIEW OF GROWTH CODE
DENIALS BY THE NUMBERING POOLING ADMINISTRATOR
FOR THE WINTER PARK EXCHANGE**

Explanation of Proprietary Information

1. The attached information contains BellSouth's switch utilization information. The disclosure of this information to BellSouth's competitors is likely to give them an undue advantage and cause competitive harm to BellSouth. BellSouth treats this information as confidential information and protects it from disclosure. Therefore, this information constitutes **proprietary** confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

LOCATION

REASON

Page 1, lines 1-10	1
Page 2, column A, lines 1-10	1
Page 2, lines 11 and 12	1
Page 2, column B, lines 1-10	1
Page 3, line 1	1
Page 4, lines 1-5	1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 040574-TL
Request for Specified Confidential Classification
Page 1 of I
07/08/04**

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION FOR
BELLSOUTH'S PETITION FOR EXPEDITED REVIEW OF GROWTH CODE
DENIALS BY THE NUMBERING POOLING ADMINISTRATOR
FOR THE WINTER PARK EXCHANGE**

TWO REDACTED COPIES

ATTACHMENT C

BellSouth Telecommunications, Inc.
FPSC Docket No. 040574-TL
Request for Specified Confidential Classification
Page 1 of 1
07/08/04

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION FOR
BELLSOUTH'S PETITION FOR EXPEDITED REVIEW OF GROWTH CODE
DENIALS BY THE NUMBERING POOLING ADMINISTRATOR
FOR THE WINTER PARK EXCHANGE**

ONE HIGHLIGHTED COPY